TETRA TECH EM INC.

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March 31, 2006

Mr. Steve Maybury
New Jersey Department of Environmental Protection
Site Remediation & Waste Management
Division of Remediation Management and Response
Bureau of Northern Case Management
401 East State Street, 5th Floor
Trenton, New Jersey 08625-0028

Subject: **Response Plan**

Reference: **North Creek CCC Property located at 875 New Durham Road, Edison, NJ**

Dear Mr. Maybury:

On behalf of Ford Motor Company, Tetra Tech is submitting the attached Response Plan for the removal of crushed concrete material from the North Creek CCC (NC) property located at 875 New Durham Road, Edison, NJ. This plan incorporates the specific requirements as outlined in the NJDEP Administrative Order issued to Ford Motor Company (Ford) on March 24, 2006 (EA ID # PEA06003 PI U1166).

All information in this Plan concerning the crushed concrete on the North Creek CCC New Durham Road property, including the origin of the crushed concrete, was obtained from discussions with NC. Tetra Tech has relied on this information in drafting this Response Plan.

This plan details the removal and disposal of crushed concrete material currently located on the North Creek CCC property referenced above that was reportedly transported from the former Ford Edison Assembly Plant property located at 939 U.S. Highway Route 1 in Edison, New Jersey by North Creek. This Response Plan addresses the following major elements:

1. Prepare a public information and participation plan that includes:

    - Posting a notice of "Intended Remediation Activities" for the site.
    - Create an Information Fact Sheet.
    - Develop and Launch a Website.

2. Identify, remove and dispose of stockpiled crushed concrete material at an approved disposal facility, if required.

3. Implement and maintain dust control measures including air monitoring.

4. Provide disposal tracking logs and documentation for crushed concrete materials removed from the North Creek site.

5. Collect and analyze "post-excavation" samples from the soil located below the removed material to insure that no material is left at the site.

6. Submit progress reports to the NJDEP.

Current Summary

The property is located at 845 New Durham Road, Edison, NJ. The site is currently being developed as a commercial property consisting of a multi-story hotel. Reportedly up to 14,000 cubic yards of crushed concrete material was transported to the property by NC for use as structural fill below the building currently under construction. Analytical data corresponding to the crushed concrete material presented to NC at the time of pickup from the Ford Edison Assembly Plant property indicates that the material meets the NJ Residential Direct Contact Soil Cleanup Criteria (RDCSCC) for all constituents. Although during a recent site visit stockpiles were observed on the site, it is reported that these stockpiles are not part of the crushed concrete material obtained from the Ford Edison Assembly Plant site. A site map is included as Attachment 1.

Public Information and Participation Plan

As part of the Public Information and Participation plan, Ford will post a notice of "Intended Remediation Activities" in a local newspaper. The notice will be a minimum of a quarter page and will list the intended remedial actions for the site along with proposed times and dates. The listing will also include company contact names and telephone numbers and a reference to the public information website (once launched). Ford will also create an Information Fact Sheet that will be available for hand-out during any public meetings. The Fact Sheet will detail relevant site history activities, NJDEP involvement and proposed future remediation activities. Ford contact names, telephone numbers and e-mail addresses will be printed on the Fact Sheet, as well as a reference to the NJDEP Office of Community Relations. In addition, Ford will also develop and launch a website as a repository for information that can be accessed by the general public.

Investigation and Delineation Sampling

Based upon information supplied by NC, an estimated 14,000 cubic yards of crushed concrete material was used as structural fill during the construction of the Hotel building. As previously stated, NC reportedly has analytical data indicating that the crushed concrete meets RDCSCC criteria. To provide confirmation, Tetra Tech will perform delineation sampling utilizing a Geoprobe unit with direct push technology to evaluate the vertical and horizontal limits of the in-situ crushed concrete material. Samples will be collected at various locations based upon the approximate location of the crushed concrete material as reported by NC. Samples will be collected as close to the existing Hotel building as possible. The boundaries of the crushed concrete material will be considered established when horizontal and vertical samples do not contain crushed concrete material. Samples of the crushed concrete will be collected as per NJDEP protocol and will be analyzed for PCBs, Base Neutral compounds with a forward library search (B/N+15) and TPH. The collected samples will be sent to Severn Trent Laboratories, a NJ-certified laboratory.

Additional composite samples may be collected for waste classification parameters in the event that some volume of material may be removed to the extent practical. The waste classification samples will be collected at a frequency of one sample per 500 cubic yards based upon the disposal requirements and frequency set by the Middlesex County Utility Authority (MCUA) landfill. The waste classification analysis consists of Total Petroleum Hydrocarbons (TPHs), Poly-Aromatic Hydrocarbons (PAHs)/Base Neutral (B/N) Compounds, Polychlorinated Biphenyls (PCBs), RCRA Characteristics, and Full Toxicity Characteristic Leaching Procedure (TCLP) Parameters. All samples will be analyzed on an accelerated turn-around time of one week (5 working days). A map depicting the proposed delineation sampling locations will be prepared and submitted to the NJDEP upon completion of a preliminary investigation and when site access agreements have been negotiated.

The analytical results from the PCB, B/N+15 and TPH analysis will be compared to the NJ Residential Direct Contact Soil Cleanup Criteria (RDCSCC). If no PCBs greater than 0.49 ppm are detected and no other constituents exceed their respective RDCSCC, Ford will recommend that a No Further Action (NFA) letter be issued by NJDEP for this site. If sampling indicates that one or more constituents exceed the RDCSCC criteria, Ford recommends that a Deed Notice and appropriate institutional controls be established for the affected areas provided agreement is obtained from the site owner. If the crushed concrete is required to be removed, Ford will adhere to the removal and disposal procedures outlined below.

Removal and Disposal Procedure

Upon completion and review of the waste classification sampling and analysis, in-situ crushed concrete material requiring removal that is accessible and does not impact the existing Hotel building will be excavated and removed by Ford. All crushed concrete

material leaving the site will be transported by a registered and licensed hauler, if required under applicable New Jersey Statutes and regulations, to MCUA Middlesex County Landfill or BFI Conestoga Landfill. It is anticipated that the crushed concrete material will be transported to the landfill for use as cover material. A Tetra Tech site representative will ensure that all shipping manifests, bills of lading or any other required shipping documents have been properly completed for endorsement by Ford or Ford's appointed representative prior to trucks leaving the site. No material will leave the site without prior written approval from the NJDEP.

Dust Management Plan and Health & Safety Plan

A Dust Management Plan and site specific Health & Safety Plan (HASP) will be prepared for all workers entering the site. The HASP will be prepared in accordance with applicable Occupational Safety & Health Administration (OSHA) requirements.

All on-site activities will be conducted in a manner to minimize fugitive dust emissions. To accomplish this, the following controls will be implemented:

- All stockpiled material to be removed from the site will be covered or placed in tarped roll-off containers to prevent dust migration.
- A water truck and water spray will be used to control dust during removal and loading activities. Additionally, a road sweeper will be used at the site for routine road maintenance to actively control dust emissions.
- A real-time air monitoring program will be implemented before any removal work is performed. This will include monitoring of dust in the exclusion zone, at the perimeter of the site, and for personnel working in the exclusion zone. Also, a meteorological station will be placed at the site to record information such as daily temperatures, wind speed and direction, etc.
- All material loading will occur on a loading area prepared with two layers of 6-mil thick nylon reinforced polyethylene sheeting. After each truck is loaded, any material that may have spilled onto the body of the truck will be swept onto the polyethylene sheeting. Any loose material observed on and around the tires will be removed with a broom. Any material build-up on the reinforced polyethylene sheeting will be carefully swept and returned to the stockpile for load-out. Damaged polyethylene sheeting will be immediately replaced.
- Additional decontamination of the vehicles/equipment may take place in the event that the procedures described above are not sufficient to remove material. Absorbent tracking pads and/or a light power wash would be utilized in the event that dry-decontamination did not adequately remove material. This control will adequately address the concern for crushed concrete material leaving the site.

Ford will immediately cease removal activities at the site if any of the air monitoring action levels or other standards in the attached dust management program is exceeded. In addition, Ford will cease work if the control measures detailed in this Plan or any other provisions of the Administrative Order, regulations or law, are not being met. If this

occurs, Ford will not resume work activities until the issues are resolved to the satisfaction of NJDEP.

The specific activities to be conducted for the air monitoring at the site are presented in Attachment 2.

Post Excavation Sampling

In accordance with the NJDEP Technical Requirements for Site Remediation, post-excavation samples will be collected from all areas where the crushed concrete material is removed. (Bottom of excavation - 1 sample per 900 square feet; Sidewall – 1 sample for every 30 linear feet of sidewall with a minimum of one sample being collected). The post-excavation samples will be analyzed for PCBs, Base Neutral compounds with a forward library search (B/N+15), and TPH. The collected samples will be sent to Severn Trent Laboratories, which is a NJ certified laboratory. Laboratory analysis will be performed on an accelerated turn-around time of one week (5 working days). After receipt of analytical data, Ford will confirm that the constituents do not exceed their applicable NJDEP soil cleanup criteria. If any constituents remain above their respective NJDEP soil cleanup criteria in the areas of excavation, additional excavation will occur.

Reporting

As required in the Administrative Order, Ford will provide the following information:

- Progress reports will be submitted to the NJDEP and the designated official from Edison Township on the 1st and 16th of each month of removal activity at the site. The progress report will include a summary of activities conducted and results of air monitoring for the period being summarized.
- A final report will be issued to the NJDEP and Edison Township officials within 14 days after completion of all remedial action activities and receipt of final analytical data. The final report will include a discussion of the procedures taken to eliminate all possible exposure from the material removed and the effectiveness of the procedures implemented to control fugitive dust emissions. The report will also include origin and disposal forms pursuant to Solid Waste Management regulations that identify all material removed form the site. This information will include the weight of the material and equivalent cubic yards.
- Other reports required by the NJDEP or other significant correspondence issued to the NJDEP will be provided to Edison Township officials.

Schedule

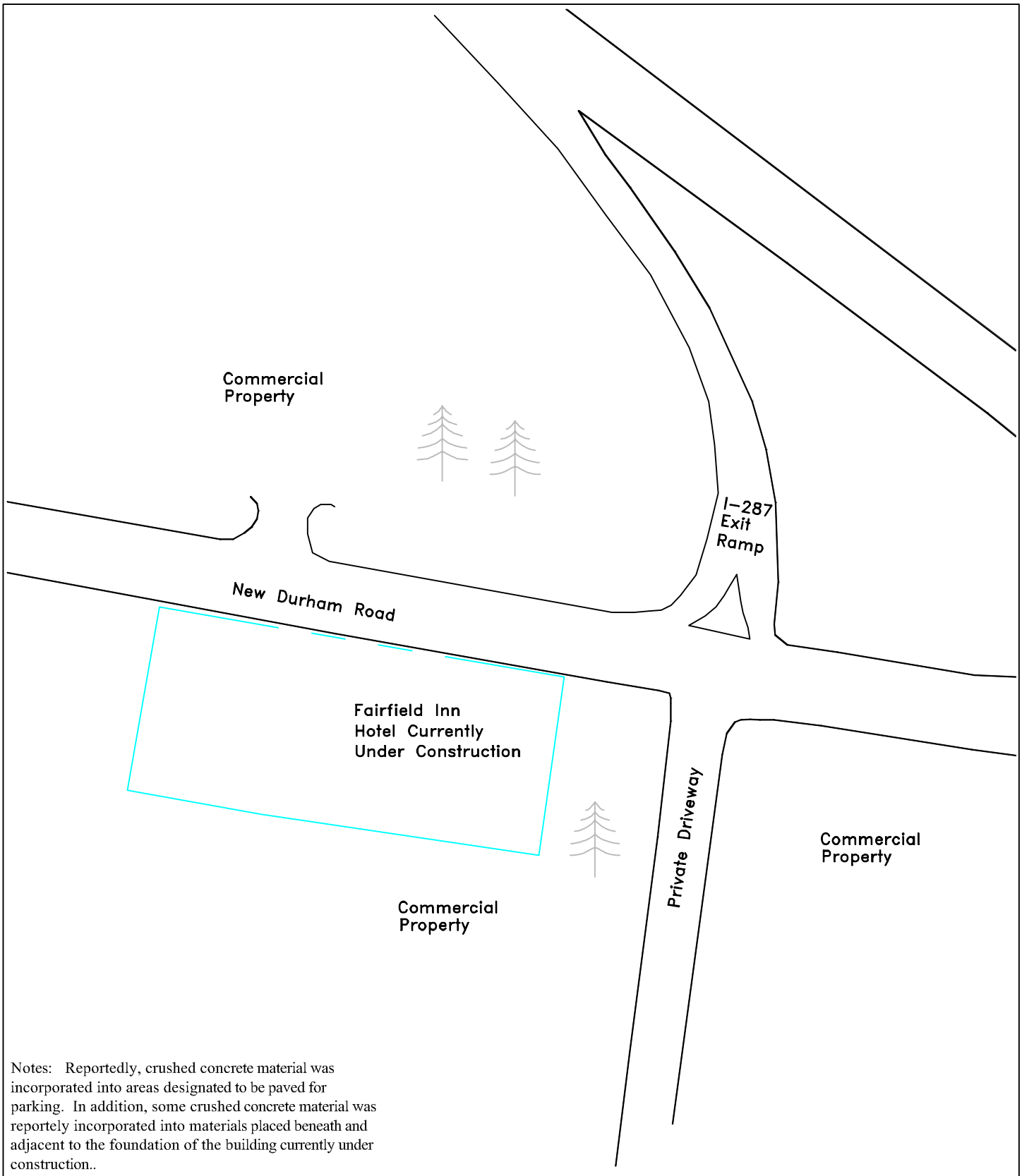
Ford will initiate work for the above referenced activities within 2 days after written approval from the NJDEP. Ford Motor Co. will complete remedial action activities within 30 days after approval of this plan.

Ford Motor Company will notify you prior to the start of any on-site activities and immediately if there are any changes to the schedule. If you have any questions, please contact me at 973-659-9996, extension 231.

Sincerely,

Douglas Sullivan
Senior Project Manager

ATTACHMENT 1
(Site Map)



Notes: Reportedly, crushed concrete material was incorporated into areas designated to be paved for parking. In addition, some crushed concrete material was reportely incorporated into materials placed beneath and adjacent to the foundation of the building currently under construction..

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LEGEND

Estimated Property Boundary

Wooded Area

SITE ID: 875 New Durham Road
North Creek CCC
Edison, New Jersey

CLIENT: Ford Motor Company

SCALE	DRAWN BY:	CHECKED BY:
1" = 100'	JB	DS
PLOT DATE: 3/31/2006		SITE MAP

ATTACHMENT 2
(Dust Management and Health & Safety Plans)

DUST MONITORING PLAN

EXCLUSION ZONE MONITORING:

Purpose: Evaluate release of dust in zones to determine proper dust control measures.

- Exclusion zone (where work activities will occur) will be established.
- PDR-1000 Dust monitors will be located downwind at the perimeters of the exclusion zones.
- Action levels to implement dust control will be sustained readings (5 minutes) above 5 mg/m^3.
- Visual assessment of dust levels will be used to implement dust control.
- Dust control measures shall be water or dry agents during cold weather and shall be on-site at all times.

PERIMETER MONITORING:

Purpose: To identify and control off-site dust emissions.

- Determine strategic perimeter sampling locations based on wind direction, on-site operations, neighboring properties, public thoroughfares, and NJ DEP concurrence.
- DR-4000 respirable particulate monitors (PM-10) with omni-directional inlets will be used to measure levels of respirable dust at perimeter of the property.
- Action levels to implement dust control or to trigger monitor for specific contaminates of concern (i.e. PCB's) will be sustained readings (15 minutes) above 150 ug/m^3 as identified in the National Ambient Air Quality Standards (NAAQS). (See Attachment A-NAAQS Standards)

PERSONAL MONITORING:

Purpose: Evaluate worker exposure during normal work activities to be able to wear appropriate PPE.

- Determine personnel exposure of worker.
- Monitoring for total dust.
- Use pre-weighed filter cassettes and a low flow pump for dust sampling. (See Attachment B-Sampling Methods)
- Action level to implement upgrade of personal protection equipment (PPE) for dust is 15 mg/m^3.

Based on the low levels of PCB's (Generally 2 ppm) the action level for dust that would trigger PCB concerns and monitoring is estimated at 500 mg/m^{3*}. If this action level is exceeded monitoring for PCB's will require the following:

- Use sorbent tube and low flow pump for PCB sampling. (See Attachment B-Sampling Methods)
- Action level to implement upgrade of personal protection for PCB's is 0.001 mg/m^3 for the National Institute for Occupational Safety and Health (NIOSH) and 1 mg/m^3 for the Occupational Safety and Health Administration (OSHA). Tetra Tech recommends using the NIOSH standard as an action level for upgrading PPE.

Formula to correlate PCB levels in soil to dust levels is:

(Calculation: Convert PCB soil levels to a fraction (2 mg/kg = 0.000002) and multiply by the particulate concentration). For example if the particulate concentration is at 500 mg/m^3 then the concentration of PCB in air is 0.001 mg/m^3, which is the REL.

METEOROLOGICAL STATION:

Purpose: To record weather conditions related to the site.

- Determine location of METSTATION.
- Record daily the temperature, relative humidity, barometric pressure, wind speed and direction.
- Assess this information and correlate with particulate monitoring results.

REPORTING:

Purpose: To ensure communications between all parties.

- Progress reports will be submitted to Ford prior to the 1st and 16th of each month. Ford will issue reports to the NJDEP and municipal officials in accordance with the Administrative Order EA ID #: PI V1166.
- Progress reports will summarize results of the perimeter monitoring and meteorological information during that period.
- Final report will be generated at the end of the project and will include all perimeter monitoring results, meteorological information, and field documentation logs ensuring the effectiveness of the dust management plan. Ford will issue reports to the NJDEP and municipal officials in accordance with the Administrative Order EA ID #: PI V1166.

CONCLUSION:

Monitoring of dust levels will take place prior to removal activities, during removal activities, and after removal activities are complete.

ATTACHMENT A
(NAAQS Standards)

National Ambient Air Quality Standards

POLLUTANT	STANDARD VALUE *		STANDARD TYPE
Carbon Monoxide (CO)			
8-hour Average	9 ppm	(10 mg/m^3)	Primary
1-hour Average	35 ppm	(40 mg/m^3)	Primary
Nitrogen Dioxide (NO_2)			
Annual Arithmetic Mean	0.053 ppm	(100 µg/m^3)	Primary & Secondary
Ozone (O_3)			
1-hour Average	0.12 ppm	(235 µg/m^3)	Primary & Secondary
8-hour Average	0.08 ppm	(157 µg/m^3)	Primary & Secondary
Lead (Pb)			
Quarterly Average	1.5 µg/m^3		Primary & Secondary
Particulate (PM 10) *Particles with diameters of 10 micrometers or less*			
Annual Arithmetic Mean	50 µg/m^3		Primary & Secondary
24-hour Average	150 µg/m^3		Primary & Secondary
Particulate (PM 2.5) *Particles with diameters of 2.5 micrometers or less*			
Annual Arithmetic Mean	15 µg/m^3		Primary & Secondary
24-hour Average	65 µg/m^3		Primary & Secondary
Sulfur Dioxide (SO_2)			
Annual Arithmetic Mean	0.030 ppm	(80 µg/m^3)	Primary
24-hour Average	0.14 ppm	(365 µg/m^3)	Primary
3-hour Average	0.50 ppm	(1300 µg/m^3)	Secondary

* Parenthetical value is an approximately equivalent concentration.

ATTACHMENT B
(Sampling Methods)

SKC Home
Homeland Security
Contact SKC
Search
Products
Ordering
What's New
Customer Service
Rentals
Downloads
Sales & Service
Email Newsletter
Catalog Request
Sampling Help
Sampling Guides
Laboratories
Links
About SKC
Events / Seminars
Site Map

Guide to OSHA/NIOSH/ASTM Air Sampling Methods

Dust total nuisance

Chemical Hazard: Dust total nuisance

Agency Reference: OSHA CSI

Agency Standards

TWA (ppm): 15 mg/m3

Sample Volume (liter)

TWA: 720

Sampling Rate (ml/min)

TWA: 1500

Sampling Time

TWA (hours): 8

Analytical Method: GR -- Gravimetric Analysis

SKC Equimpent: Filter 225-8-01SC
Filter Cassette and Cyclone Holder 225-1
Filter Cassette 225-2LF

Footnotes: CSI-OSHA Chemical Sampling Information (OSHA CD-ROI

Chemical Hazards by First Letter

SKC Home
Homeland Security
Contact SKC
Search
Products
Ordering
What's New
Customer Service
Rentals
Downloads
Sales & Service
Email Newsletter
Catalog Request
Sampling Help
Sampling Guides
Laboratories
Links
About SKC
Events / Seminars
Site Map

Guide to OSHA/NIOSH/ASTM Air Sampling Methods

Polychlorinated biphenyls

Chemical Hazard: Polychlorinated biphenyls

CAS Number: 1336-36-3

Agency Reference: NIOSH 5503

Agency Standards

TWA (ppm): 0.001 mg/m3 (10 hr)

Sample Volume (liter)

TWA: 48

Sampling Rate (ml/min)

TWA: 100 (200)

Sampling Time

TWA (hours): 8 (4)

Analytical Method: GC-ECD -- Gas Chromatography-Electron Capture Detecto

SKC Equimpent: Filter 225-16
Filter Cassette 225-32
Sorbent Tube 226-39

Limit of Detection: 0.03µg/sample

LOD Note: The policies of the AIHA laboratory accreditation committee require that method detection limits must be established an

NON-HAZWOPER HEALTH AND SAFETY PLAN

Site Name: 875 New Durham Road (North Creek CCC)	**EMI Site Contact:** Matt Bianchi	**Telephone:** (973) 659-9996
Location: 875 New Durham Road, Edison, NJ	**Client Site Contact:** Mr. Todd Walton	**Telephone:** (313) 845-1921
EPA I.D. No.	**Prepared By: Doug Sullivan**	**Date:** 31 March 2006
Project No. IP483.04	**Date of Activities:** TBD	

Objectives:

- Removal of crushed concrete material at the 875 New Durham Road site.

Other activities will include implementation of:

- dust control measures including air monitoring;
- post-excavation sampling; and
- traffic control. This includes managing the flow of trucks and equipment entering and leaving the site to ensure worker and public safety.

Details regarding these activities to be conducted at the 875 New Durham Road site have been outlined in the Response Plan prepared by Tetra Tech dated March 31, 2006. This site-specific HASP is intended to ensure site activities are conducted in a safe and efficient manner. Also, this site-specific HASP relies on the specific health and safety provisions outlined in Tetra Tech's HASP for the Edison, NJ site (dated February 24, 2006).

☒ Active	☐ Uncontrolled	☐ Residential
☐ Inactive	☒ Controlled	☒ Industrial

Initial Site information

As discussed in Tetra Tech's Response Plan, the crushed concrete material currently located on the 875 New Durham road site was reportedly transported from the former Ford Edison Assembly plant property located in Edison, NJ. This material will be removed and disposed from the 875 New Durham Road site.

Applicable Safe Work Practices (SWP) attach to HASP:
Check as many as applicable

- ☒ SWP 6-1 - General Safe Work Practices
- ☐ SWP 6-2 - Control of Hazardous Energy Sources (Lockout/Tagout)
- ☐ SWP 6-3 - Safe Drilling Practices
- ☒ SWP 6-4 - Excavation Practices
- ☐ SWP 6-5 - Working Over or Near Water
- ☐ SWP-6-6 - Hot Work Practices
- ☐ SWP 6-7 - Special Site Hazards
- ☐ SWP 6-8 - Safe Electrical Work Practices
- ☐ SWP 6-9 - Fall Protection Practices
- ☐ SWP 6-10 - Portable Ladder Safety
- ☒ SWP 6-11 - Drum and Container Handling Practices
- ☐ SWP 6-13 - Flammable Hazards and Ignition Sources
- ☒ SWP 6-14 - Spill and Discharge Control Practices
- ☒ SWP 6-15 - Heat Stress
- ☒ SWP 6-16 - Cold Stress
- ☐ SWP 6-17 - Biohazards
- ☐ SWP 6-21 - Radiation Safety Practices
- ☐ SWP 6-22 - Hydrographic Data Collection
- ☐ SWP 6-23 - Permit-Required Confined Space
- ☐ SWP 6-24 - Non-Permit-Required Confined Space
- ☐ SWP 6-25 - Oil and Petroleum Distillate Fuel Product Hazards
- ☒ SWP 6-26 - Use of Heavy Equipment
- ☒ SWP 6-27 - Respirator Cleaning Procedures
- ☒ SWP 6-28 - Safe Work Practices for Use of Respirators
- ☐ SWP 6-32 - Safe Work Practice for Sampling Anthrax Contamination in Buildings
- ☐ SWP 6-33 - Safe Work Practice for UXO-Related Site work

Tetra Tech Employee Training and Medical Requirements:

Basic Training and Medical

- ☒ Initial 40 Hour Training
- ☒ 8-Hour Supervisor Training (one-time)
- ☒ Current 8-Hour Refresher Training
- ☒ Current Medical Clearance (including respirator use)
- ☒ Current First Aid Training (minimum 1 Tetra Tech employee on site)
- ☒ Current CPR Training (minimum 1 Tetra Tech employee on site)

Field Activities Covered Under This Plan:

Task Description	Level of Protection[1] Primary	Level of Protection[1] Contingency	Date of Activities
1 Air monitoring/Dust Control/Management of trucks/equipment	☐ A ☐ B ☐ C ☒ D	☐ A ☐ B ☐ C ☐ D	TBD
2 Excavation/removal of crushed concrete aggregate materials; Post-excavation sampling	☐ A ☐ B ☐ C ☒ D	☐ A ☐ B ☐ C ☐ D	TBD
Site Personnel and Responsibilities (include subcontractors):			

Employee Name and Office Code	Task(s)	Responsibilities
Project Manager (Doug Sullivan)	1 and 2	• Directs project investigation activities, makes Field Team Leader and Site Safety Coordinator (SSC) aware of pertinent project developments and plans, and maintains communications with client as necessary.
Field Team Leader/Site Safety Coordinator (SSC) (TBD) The roles of Field Team Leader and site Safety Coordinator are allowed to be fulfilled by the same person.	1 and 2	• Directs project investigation activities, makes site safety coordinator (SSC) aware of pertinent project developments and plans, and maintains communications with client as necessary. . Responsible for reporting any exceedances to the NJDEP and local officials upon discovery of exceedances • Ensures that appropriate personal protective equipment (PPE) is available, enforces proper utilization of PPE by on-site personnel, suspends investigative work if he or she believes that site personnel are or may be exposed to an immediate health hazard, implements the health and safety plan, and reports any observed deviations from anticipated conditions described in the health and safety plan to the health and safety representative.
Field Personnel	1 and 2	• Completes tasks as directed by the project manager, field team leader/SSC, and SSC, and follows all procedures and guidelines established in the Tetra Tech, Inc., Health and Safety Manual.

Emergency Contacts:	Telephone No.
Work Care	(800) 455-6155
U.S. Coast Guard National Response Center	(800) 424-8802
InfoTrac	(800) 535-5053
Hospital	(609) 394-6000
Fire department	911
Police department	911
Tetra Tech EM Inc. Personnel:	
Regional Safety Officer: Matt Bianchi (973) 659-9996, ext. 237	
Health and Safety Representative: Rick Ecord, CIH (404) 225-5527	
Office Health and Safety Coordinator: Matt Bianchi (973) 659-9996	
Project Manager: Doug Sullivan (973) 659-9996, ext. 231	
Field Team Leader/SSC: To Be Determined (TBD)	

Hospital Route Map:

Directions

1. Start at **875 NEW DURHAM RD, EDISON** going toward ramp - go **1.3** mi
2. Bear left to follow **CR-501** - go **0.5** mi
3. **CR-501** becomes **MIDDLESEX AVE[RT-27]** - go **0.6** mi
4. Turn left on **GROVE AVE** - go **0.6** mi
5. Turn right on **JAMES ST** - go **0.3** mi
6. Arrive at **JOHN F KENNEDY MEDICAL CENTER**